

## ATTACHMENT A

### Remarks

By this Amendment, independent claim 1 has been amended for clarity. Other dependent claims have also been amended for clarity or definiteness; while claims 24-26 have been deleted and new claims 34-44 have been added consistent with the changes to other dependent claims. It is submitted that the present application is in condition for allowance for the following reasons.

Initially in the *Specification* section of the outstanding Detailed Action, the examiner stated that this application does not contain an abstract as required by MPEP § 608.01(b), so that the examiner then required an abstract on a separate page. However, this requirement in a National Stage (371) application is "improper" (see MPEP § 1893.03(e)) since the PCT International Stage application contained an abstract on a separate page.

In the *Claim Rejections - 35 USC § 112* section of the Action, independent claim 1 and various dependent claims were all rejected as being indefinite. By this Amendment, various claims have been revised for definiteness in order to overcome the noted problems as well as others of a similar nature and generally to place the claims in better conformance for US practice. These corrections include the deletion of optional or preferred subject matter, which in some cases are now recited in new dependent claims as follows:

Originally Claimed in Claim:	2	15	15	16	16	20	21	27	28	33
Now Claimed in New Claim:	34	35	36	37	38	39	40	41	42	43

It will also be noted that claims 24-26 which were rejected have now been canceled. In addition, it will also be noted that the subject matters of claims 19 and 33 now shown as being added were in fact present in the original PCT claims, but were inadvertently left out when the Preliminary Amendment in this national stage application was filed.

Finally, it will be appreciated that new dependent claim 44 claims the method of manufacturing of the wind turbine blade of claim 22 from which it depends. In view of all of the changes made, it is submitted that all of the claims in this application are now definite so that the rejection under § 112 should now be withdrawn.

In the *Claim Rejections - 35 USC § 103* section, independent claim 1 and various dependent claims were rejected under 35 USC § 103 as being obvious over the principal Olsen patent in view of the Merz patent. However, for the following reasons, it is submitted that amended independent claim 1 is allowable over this combination of references.

In the Action, the examiner has noted that the Olsen patent discloses various elements as claimed in claim 1, but that the Olsen patent does not disclose a first contact part which is shaped as a ribbon. The examiner then asserts that the Merz patent teaches a contact part 5 shaped as a ribbon. However, contrary to this assertion, it is submitted that the Merz patent does not teach or disclose a ribbon-shaped contact part for the following reasons.

The part 5 in the Merz patent is a heat conductor, and it is nowhere suggested that it is a ribbon such as asserted by the examiner. The description in the Merz patent in relation to Fig. 3, at column 4, line 58 to column 5, line 3 clearly teaches that the element 5 is a heat conductor, having a construction corresponding to a coaxial

(cylindrical) cable. As a ribbon would be interpreted by one of ordinary skill to be, e.g., "something that is long [length], narrow [width], and thin [height]"<sup>1</sup> or "a long, narrow strip of fabric, used for tying something or for decoration,"<sup>2</sup> it is apparent that the Merz patent does not teach or make obvious a contact part which is ribbon-shaped as claimed in independent claim 1. Therefore, the combination of the Olsen patent and the Merz patent fails to teach a first contact part shaped substantially as a ribbon as claimed.

For the foregoing reasons, it is submitted that independent claim 1 is not made obvious by the combination of the Olsen patent and the Merz patent, so that claim 1 is allowable. For these same reasons, it is submitted that claims 2-23 and 28-43 dependent from claim 1 are likewise all allowable.

In the *Allowable Subject Matter* section, the examiner indicated that dependent claims 4-10, 14, 16-18, 22-23, and 27-33 all contained allowable subject matter (though some were rejected for indefiniteness as noted above). This indication of allowable subject matter is appreciated. However, in view of the allowability of claim 1 as noted above, it is submitted that these claims are likewise allowable without being rewritten in independent form.

Error Correction. The examiner's assistance at this time is also requested in correcting the address of the inventor from "DK" to "UK" in the records of the Patent Office. This correction has previously been requested, but correction of the error has still not been effected. The previous requests for correction are shown in the record by:

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<sup>1</sup> See: <http://encarta.msn.com/encnet/features/dictionary/DictionaryResults.aspx?refid=1861702614>

<sup>2</sup> See: <http://dictionary.cambridge.org/define.asp?key=67826&dict=CALD>

1) the Application Data Sheet filed January 16, 2007; the Request for Correction of Inventor Address filed October 7, 2007 requesting that the correction shown in the ADS be effected; and the second (renewed) Request filed April 4, 2008.

For all of the foregoing reasons, it is submitted that the present application is in condition for allowance and such action is solicited.

## ATTACHMENT B

### Amendments to the Claims

*This listing of claims will replace all prior versions, and listings, of claims in the application.*

1. (currently amended) A member for potential equalizing between a first conducting member and a second conducting member of a wind turbine blade, said member for potential equalizing comprising:
  - an electrical conductor,
  - a first contact part for providing a potential equalizing connection between said first conducting member of said wind turbine blade and said electrical conductor, and
  - a second contact part for providing a potential equalizing connection between said second conducting member of said wind turbine blade and said electrical conductor,wherein said first contact part is shaped substantially as a ribbon and said first conducting member comprises carbon fibres.
2. (currently amended) A member for potential equalizing according to claim 1, wherein said first contact part comprises a conducting metal ribbon ~~such as e. g. a flexible sheet or a flexible mesh.~~
3. (currently amended) A member for potential equalizing according to claim 42, wherein said conducting metal ribbon has a width of more than 1 cm, ~~preferably said conducting metal ribbon has a width of between 2 to 30 cm, more preferably said conducting metal ribbon has a width of between 3 to 10 cm, such as 5 cm.~~
4. (currently amended) A member for potential equalizing according to claim 42, wherein said first contact part further comprises a contact-enhancing layer connected to ~~the~~ a side of said conducting metal ribbon to be oriented towards said first conducting member.

5. (previously presented) A member for potential equalizing according to claim 4, wherein said contact-enhancing layer extends beyond the conducting metal ribbon in at least one direction in the plane of the conducting metal ribbon.

6. (currently amended) A member for potential equalizing according to claim 4, wherein said first contact part further comprises a cover layer connected to ~~the~~ a side of said conducting metal ribbon to be oriented away from said first conducting member.

7. (previously presented) A member for potential equalizing according to claim 6, wherein said cover layer extends beyond the conducting metal ribbon in at least one direction in the plane of the conducting metal ribbon.

8. (currently amended) A member for potential equalizing according to claim 4, further having, on a side of said conducting metal ribbon opposite to said contact-enhancing layer, ~~and a cover layer~~, wherein said contact-enhancing layer and said cover layer extend beyond the conducting metal ribbon in at least two directions in the plane of the conducting metal ribbon and said contact-enhancing layer extends beyond said cover layer in at least two directions in the plane of the conducting metal.

9. (currently amended) A member for potential equalizing according to claim 4, wherein ~~said cover layer and/or said contact-enhancing layer~~ is a flexible and conductive material, ~~more preferably said contact-enhancing layer~~ which comprises a loose non-woven material ~~such as e. g. a web, a veil or a fleece material~~.

10. (currently amended) A member for potential equalizing according to claim 4, further having, on a side of said conducting metal ribbon opposite to said contact-enhancing layer, a cover layer; and wherein one of said cover layer ~~and/or said contact-enhancing layer~~ is at least partially impregnated with a resin ~~such as a prepreg or a semi-preg, preferably a single-side impregnated semi-preg~~.



11. (currently amended) A member for potential equalizing according to claim 1, wherein said second contact part comprises a clamp for connecting to a lightning conductor, ~~preferably a clamp for connection to a lightning conductor cable.~~

12. (previously presented) A member for potential equalizing according to claim 1, wherein said second contact part is substantially equivalent to said first contact part.

13. (previously presented) A member for potential equalizing according to claim 1, wherein said electrical conductor is a conducting metal ribbon.

14. (currently amended) A member for potential equalizing according to claim 13, wherein said first contact part is a conducting metal ribbon which is one of a part of ~~and/or an extension of said conducting metal ribbon of said electrical conductor.~~

15. (currently amended) A member for potential equalizing according to claim 2, wherein said conducting metal ribbon and said electrical conductor are good conductors and relatively inert, ~~preferably said conducting metal ribbon and/or said electrical conductor comprise a metal selected from the group consisting of copper, steel, stainless steel, aluminum, nickel, chromium, tin and silver, more preferably said conducting metal ribbon and/or said electrical conductor comprise copper.~~

16. (currently amended) A member for potential equalizing according to claim 4, further having, on a side of said conducting metal ribbon opposite to said contact-enhancing layer, a cover layer; and wherein at least one of said cover layer and/or contact-enhancing layer is a good conductor and relatively inert, ~~preferably said cover layer and/or said contact-enhancing layer comprise a metal selected from the group consisting of copper, steel, stainless steel, aluminum, nickel, chromium, tin and silver, more preferably said cover layer and/or said contact-enhancing layer comprise stainless steel.~~

17. (currently amended) A member for potential equalizing according to claim 15;  
wherein said first contact part further comprises a contact-enhancing layer  
connected to a side of said conducting metal ribbon to be oriented towards said first  
conducting member and a cover layer connected to a side of said conducting metal  
ribbon to be oriented away from said first conducting member, and  
wherein at least one of said conducting metal ribbon, cover layer, said contact-  
enhancing layer and said electrical conductor comprises a combination of materials.

18. (currently amended) A member for potential equalizing according to claim 17,  
wherein said combination of materials is inhomogeneous, preferably and is selected  
from one of:

- a layered structure, such as selected from one of silver-coated tin or silver-coated  
copper, and/or
- a structure with particulate integrated material, such as selected from one of a  
metal with a filler, or a polymer with carbon black, or metal particles, and/or
- a structure comprising fibres, such as selected from one of glass fibres, aramid  
fibres and/or carbon fibres.

19. (currently amended) A member for potential equalizing according to claim 1, further  
comprising at least one further contact part for providing a potential equalizing  
connection between one or more further conducting members of said wind turbine blade  
and said electrical conductor.

20. (currently amended) A member for potential equalizing according to claim 1,  
wherein said first contact part is adapted to provide a potential equalizing connection to  
said first conducting member, ~~characterized in that and wherein~~ said first conducting  
member comprises fibres such as selected from one of reinforcement fibres in a carbon-  
fibre and/or glass-fibre reinforced plastic, ~~preferably a significant part of the~~  
~~conductance of said first conducting member is provided for by a carbon fibre~~  
~~component of said first conducting member.~~



21. (currently amended) A member for potential equalizing according to claim 1, wherein said conducting metal ribbon is oriented substantially orthogonal to at least some of the carbon fibres of said first conducting member, ~~preferably said conducting metal ribbon is oriented substantially orthogonal to the main orientation of the carbon fibres of said first conducting member.~~

22. (currently amended) A wind turbine blade comprising a member for potential equalizing according to claim 1;

wherein said first conducting member is connected to said first contact part of said member for potential equalizing, said first conducting member optionally comprising carbon fibres and

a second conducting member connected to said second contact part of said member for potential equalizing.

23. (currently amended) A wind turbine blade comprising as claimed in claim 22, and further including a number of said members for potential equalizing according to claim 1, said members for potential equalizing connected to said first and second conducting members which are positioned at one of regular or irregular intervals along the a length of said wind turbine blade.

24.-26 (canceled)

27. (currently amended) A method for manufacturing of a member for potential equalizing according to claim 1, comprising the steps of:

- providing a contact-enhancing layer at ~~and/or~~ near said first contact part,
- providing a conducting metal ribbon at least in said first contact part,
- providing ~~an~~ the electrical conductor,
- ~~- optionally providing a cover layer at and/or near said first contact part, and~~
- providing a second contact part.

28. (currently amended) A method for manufacturing of a member for potential equalizing according to claim 1, comprising the steps of:

- providing said first conducting member to be potential-equalized,
- providing a contact-enhancing layer at least partially in contact with said first conducting member,
- providing a conducting metal ribbon in contact with at least a part of one of said first conducting member ~~and/or said optional contact-enhancing layer,~~
- providing ~~an~~ said electrical conductor,
- ~~- optionally providing a cover layer in contact with said conducting metal ribbon, and~~
- providing a second contact part.

29. (previously presented) A method for manufacturing according to claim 27, wherein said conducting metal ribbon and said electrical conductor are integrated.

30. (currently amended) A method for manufacturing according to claim ~~27~~41, wherein at least one of said contact-enhancing layer and said ~~optional~~ cover layer is one of a prepreg, a semi-preg or a dry loose non-woven material ~~such as a web, a veil or a fleece material, preferably a single side impregnated semi-preg.~~

31. (currently amended) A method for manufacturing according to claim ~~27~~41, further comprising the step of:

- providing one of a resin ~~and/or~~ an adhesive in contact with one of said contact-enhancing layer, ~~and/or~~ said conducting metal ribbon, ~~and/or~~ said cover layer.

32. (previously presented) A method for manufacturing according to claim 27, further comprising the step of:

- pre-consolidating said member for potential equalizing.

33. (currently amended) A method for manufacturing according to claim 27, further comprising the step of:

- curing said member for potential equalizing, ~~optionally by a co-curing process~~  
wherein said member ~~(2)~~ for potential equalizing and at least a part of said wind turbine are cured together.

34. (new) A member for potential equalizing according to claim 2, wherein said conducting metal ribbon is one of a flexible sheet or a flexible mesh.

35. (new) A member for potential equalizing according to claim 15, wherein one of said conducting metal ribbon or said electrical conductor comprises a metal selected from the group consisting of copper, steel, stainless steel, aluminum, nickel, chromium, tin and silver.

36. (new) A member for potential equalizing according to claim 15, wherein one of said conducting metal ribbon or said electrical conductor comprises copper.

37. (new) A member for potential equalizing according to claim 16, wherein one of said cover layer or said contact-enhancing layer comprises a metal selected from the group consisting of copper, steel, stainless steel, aluminum, nickel, chromium, tin and silver.

38. (new) A member for potential equalizing according to claim 16, wherein one of said cover layer or said contact-enhancing layer comprises stainless steel.

39. (new) A member for potential equalizing according to claim 20, wherein a significant part of the conductance of said first conducting member is provided for by a carbon fibre component of said first conducting member.

40. (new) A member for potential equalizing according to claim 21, wherein said conducting metal ribbon is oriented substantially orthogonal to the main orientation of the carbon fibres of said first conducting member.

41. (new) A method for manufacturing of a member for potential equalizing according to claim 1, comprising the steps of:

- providing a contact-enhancing layer at or near said first contact part,
- providing a conducting metal ribbon at least in said first contact part,
- providing the electrical conductor,
- providing a cover layer at or near said first contact part, and
- providing a second contact part.

42. (new) A method for manufacturing of a member for potential equalizing according to claim 1, comprising the steps of:

- providing said first conducting member to be potential-equalized,
- providing a contact-enhancing layer at least partially in contact with said first conducting member,
- providing a conducting metal ribbon in contact with at least a part of one of said first conducting member or said contact-enhancing layer,
- providing said electrical conductor,
- providing a cover layer in contact with said conducting metal ribbon, and
- providing a second contact part.

43. (new) A method for manufacturing according to claim 27, further comprising the step of:

- curing said member for potential equalizing by a co-curing process wherein said member for potential equalizing and at least a part of said wind turbine are cured together.

44. (new) A method for manufacturing of a wind turbine blade having a member for potential equalizing according to claim 22, the method comprising the steps of:

- providing said first conducting member connected to said first contact part of said member for potential equalizing, and
- providing said second conducting member connected to said second contact part of said member for potential equalizing.